



901 N Tatnall Street, 2nd Floor
Wilmington, DE 19801
(302) 576-5310
bonnie.l.metz@verizon.com

September 26, 2017

Donna Nickerson, Secretary
Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

Dear Ms. Nickerson:

Re: MCI Access Transmission Services Corp. Safety-Valve Relief Application

In accordance with the requirements of the Delaware Public Service Commission's May 22, 2007 order at Docket No. 07-99, MCI Access Transmission Services Corp. ("MCI") submits the attached application for additional numbering resources.

The enclosed documents contain proprietary information. MCI respectfully requests that the Commission protect this information accordingly.

If you have any questions, please do not hesitate to contact me. .

Sincerely,


Bonnie Metz

Attachments

EXPURGATED

MCI ACCESS TRANSMISSION SERVICES CORP.

Safety-Valve Relief Application

Executive Overview

MCI Access Transmission Services Corp. ("MCI") has an urgent need for 1,000 consecutive numbers for a large business customer, XXXX. Per the attached customer letter, XXXX is requesting new numbers for expansion.

MCI is unable to fulfill XXXX's numbering requirements with current inventory. The resources reside in the KGPRPADODOS0 in the Lewes Rate Center. The Rate Center has approximately 392 available numbers.

MCI has applied to Neustar for the requested numbers in the KGPRPADODOS0 switch and was denied because it does not meet the MTE and/or Utilization requirements for this rate center. (see attached). Accordingly, under 47 C.F.R. § 52.15(g)(4), MCI asks that the Commission grant its waiver request and direct Neustar to issue MCI the 1,000 consecutive numbers.

EXPURGATED

DE PSC Docket Number 17-XXX- Lewes Safety Valve Request

- 1. A compelling and permissible need for the requested additional numbering resources (with appropriate reference to rules or orders of the FCC).**

MCI Access Transmission Services Corp., a wholly-owned subsidiary of Verizon Communications Inc., ("MCI") has an urgent need for 1,000 numbers for one of its customers, XXXXX ("XXXXX"). Per the attached customer letter, XXXXX is expanding its business and requires 1,000 consecutive numbers in Lewes. MCI does not have current inventory to satisfy this customer's requirements.

According to the Third Report and Order and Second Order on Recon. in CC Dkt. No. 96-98 and CC Dkt. No. 99-200, at ¶¶ 61-64, 17 FCC Rcd. 252 (2001) (the "Third Order"), a state commission may grant a carrier's safety valve request when the carrier receives a specific customer request for numbering resources that exceeds the carrier's available inventory.

- 2. A description as to why the granting of the particular application will not run the risk that numbering resources will be inefficiently used.**

MCI will use the additional numbering resources for only this specific customer, XXXXX, and agrees to return the numbering resources to NeuStar if the customer request is withdrawn or declined. Verizon further agrees that it will not retain the numbering resources to serve other customers without first meeting the FCC's growth numbering resource requirements per ¶64 of the Third Order.

- 3. Written evidence that the NANPA or PA has rejected the carrier's direct request for the additional number resources.**

The rejection letter from NANPA is attached with this filing.

- 4. Describe any long-term impact to numbering resources for the request is granted.**

This request for 1000 additional numbers will not impact the inventory on available numbers assigned to MCI to serve new customers in this area and will be returned to NeuStar if the customer request is withdrawn or declined. As such, granting this request will not result in any long term impacts to MCI's numbering resources of in the State of Delaware.

Thomas Quirk
Verizon Business Services
3900 Washington Street
Wilmington, DE 19802

[REDACTED] in Lewes, DE is [REDACTED] and will be expanding with other offices and another campus in the near future. We are embarking on a strategic plan that will centralize more of our phone services out of our newly added Verizon SIP circuit located at [REDACTED]. With this new office being located at an off-site location and the numbers being in the SIP circuit, it gives us the capability to utilize the "Unscreened ANI/CPN" and the E911 feature. To successfully implement this project, we will require 1000 contiguous range of DID numbers that are not in the 302-703-3xxx, 0xxx or 9xxx ranges due to the numbering plan currently in our PBX on four PRI circuits. We would like to have numbers in the 302-xxx-7xxx or 302-xxx-6xxx. The physical address for these numbers will [REDACTED]

The addition of 100 contiguous DID numbers will contribute to the simplicity of administrative support and cost savings to the corporation.

Sincerely,



_____ MILTON _____

Thousands-Block Number Pooling Administration Guidelines (TBPA) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 302-LEWES-DE-1037111

Date: Thursday, September 14, 2017

OCN: 7220

Company Name: MCI WORLD COM
COMMUNICATIONS, INC. - DE

Rate Center: LEWES

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: [302-703]-3

Name of Block Applicant: Dawn lawrence

Signature: Dawn lawrence

Title: eng

Phone: 972-578-6412-

Fax: 2142371400

E-Mail: DAWN.R.LAWRENCE@XO.COM

A. Available Numbers: 392

B. Assigned Numbers: 468

C. Total Numbering Resources: 1000

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation³: 0

List
Excluded
Code(s) or
Block(s):

Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Month	Mont h
1	2	3	4	5	6	7	8	9	10	11	12		

E. Growth
History -
Previous 6
months⁴

<u>12</u>	<u>0</u>	<u>64</u>	<u>20</u>	<u>1</u>	<u>0</u>						
-----------	----------	-----------	-----------	----------	----------	--	--	--	--	--	--

F. Forecast -
Next 12
months⁵

<u>1008</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>
-------------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 174.667

H. Months
to
Exhaust⁶ =

Numbers Available for Assignment to
Customers (A)

Average Monthly Forecast (G)

Block Requested

1

Available Numbers

392

Months To Exhaust

2.244

I.
Utilization⁷ =

Assigned Numbers (B)

X 100 =

46.8

Total Numbering Resources (C)-Excluded
Numbers (D)

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Report on all resources for the requested geographic area, including newly acquired blocks/codes.

³Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

⁴Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month 1, and Month 6 as the current month.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

⁶To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii))

Metz, Bonnie L

From: agnes.rom@neustar.biz
Sent: Thursday, September 14, 2017 2:24 PM
To: Code Administrators; Lawrence, Dawn
Cc: PA_Part3@neustar.biz
Subject: 302-LEWES-DE-1037111 DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 14 September 2017

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 302-LEWES-DE-1037111

Date of Application: 09/14/2017 Effective Date: _____
Date of Receipt: 09/14/2017 Date of Response: 09/14/2017

Service Provider Name: MCI WORLDCOM COMMUNICATIONS, INC. - DE
(LERGTM Routing Guide¹) OCN: 7220
Parent Company OCN: 7229

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Agnes Rom Phone: 925-363-7650
Signature of Pooling Administrator
Agnes Rom Fax: 925-363-7681
Name (print)
Email: agnes.rom@neustar.biz

 NPA-NXX or
NPA-NXX-X : Block Assigned: _____
Block Reserved : _____

Block Reservation

Expiration Date : _____

Block/Code

Modified : _____

Block/Code

Disconnected : _____

Block Contaminated (Yes or No): _____

If yes, enter the number of TNs contaminated (1-1000): _____

Switch Identification (Switching/POI)²:

KGPRPADODS0

Rate Center:

LEWES

X Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

¹ Telcordia® is a registered trademark and LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language® Location Code (CLLI™ Code) of the switching entity/POI shown on the Part 1A form. Common Language® is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.



CONFIDENTIAL AND PROPRIETARY ATTESTATION

BONNIE L. METZ, Counsel for MCI Access Transmission Services Corp, hereby attests that the information contained in the attached letter, report, filing or application as provided to the Delaware Public Service Commission should be considered confidential or proprietary and is not subject to inspection by either the public or by other parties unless an appropriate proprietary agreement is executed.

In compliance with (26 *Del. C. Admin.* §1000, 1.11) this filing includes a public version of the document and this signed attestation.

Attested on this date: 9-26-17

Bonnie Metz
Signature
Bonnie Metz
Name
Attorney-at-law
Title

VERIFICATION

I, RUSSELL G. WOOD, JR., Assistant Secretary of MCI Access Transmission Services Corp., hereby attest that the information contained in the attached letter, report, filing or application as provided to the Delaware Public Service Commission is true and correct to the best of my information and belief.

Attested on this date: 26 September 2017

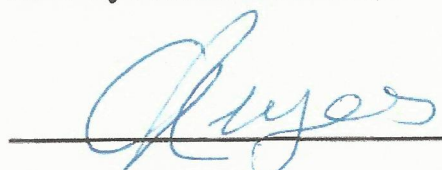

Signature

Russell G. Wood, Jr.
Name

Assistant Secretary
Title

STATE OF VIRGINIA)
) ss.
COUNTY OF LOUDOUN)

Subscribed and sworn to before me, in my presence, this 26th day of September, 2017 by Russell G. Wood, Jr.

 Notary Public

My commission expires: September 30, 2018

